

RESTRICTED CONFIDENTIAL SOURCE CODE
FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

PERSONALIZED MEDIA COMMUNICATIONS, LLC	
Plaintiff,	
v.	
GOOGLE LLC.	Case No. 2:19-cv-90-JRG LEAD CASE
AKAMAI TECHNOLOGIES, INC.	Case No. 2:19-cv-89-JRG
NETFLIX, INC.	Case No. 2:19-cv-91-JRG
Defendants.	

ORDER

Before the Court is Plaintiff Personalized Media Communications, LLC's Motion to Compel Production of Relevant Source Code and a 30(b)(6) Witness to Testify Regarding Documents. Upon consideration of the Motion, the Court finds that the motion should be and hereby is **GRANTED**.

Netflix is therefore **ORDERED** to produce, within 7 days from the entry of this order, all relevant source code, including [REDACTED]

[REDACTED].

Netflix is further **ORDERED** to designate and produce, within 21 days from the entry of this order, a witness to testify on the following topics as numbered in the notice served by Personalized Media Communications:

2. The measures taken by You to locate and identify all documents which were produced to PMC.
3. The status of Your document production efforts, including a description of the files or document repositories that You have not yet searched or from which You have not yet

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produced responsive documents but which You will search or from which You intend to produce responsive documents.

5. The steps taken by You to preserve and collect documents potentially relevant to this lawsuit.
6. The identity of persons responsible for determining, locating and gathering documents potentially relevant to this litigation, including but not limited to those documents responsive to PMC's requests and documents You were or are required to disclose under the discovery orders and local rules of the Eastern District of Texas.
7. The identity, location, and format of documents disclosing the design, specifications, research, and development of the Accused Products, including any such documents disclosing the design, specifications, research, and development of any components used in the Accused Products.
8. The identity, location, and nature of the files that were the source of the documents You produced to Plaintiff in this action, and a description by Bates range of the documents produced from each file and location.
15. The identity, location, custodian, and format of all documents, including source code, concerning the structure, architecture, function, and/or operation of each Accused Instrumentality, including, but not limited to, white papers, functional and design specifications, implementation updates/blogs, computer architecture schematics, network design specifications, testing/quality assurance requirements and results, hardware reference manuals and specifications, software reference manuals and specifications, operational manuals, and/or administrative manuals.
16. The identity, location, custodian and format of documents reflecting the development, design, functionality, architecture, structure, features, capabilities and/or programming of any Accused

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Product, including [REDACTED] as well as any components, hardware, software, and/or firmware in the Accused Products, including:

- [REDACTED]
- [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]

17. The identity, location, custodian and format of documents reflecting the development, design, functionality, architecture, structure, features, capabilities and/or programming of any Accused Product, as well as any components, hardware, software, and/or firmware in the Accused Products that are designed for, used, tailored to, and/or relied on to perform any of the following functions:

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[illegible]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18. Location and formats for all documents concerning the Accused Instrumentalities and above-described structure(s), architecture(s), function, feature, and/or operation of each Accused Instrumentality, including in source code, electronic, website, wiki, online portal, blog, periodic report, test report, development report, status report, or other format.
19. The identity, location, custodian and format of any documents reflecting or relating to software or firmware updates for the Accused Products, including any software or firmware updates relating to the functionalities described in Topic No. 15.
20. The extent to which the documents described in Topic Nos. 15-22 above have been collected and produced to PMC and, if not, the identity of any such documents that have not been produced and the reason for non-production.